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6 *Attorneys for Plaintiffs, and  
Proposed Co-Lead Counsel*

7

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 FRED JEAN, Individually and on Behalf  
11 of All Others Similarly Situated,

12 Plaintiff,

13 v.  
14 STEC, INC., MANOUCH MOSHAYEDI  
and MARK MOSHAYEDI,

15 Defendants.

16 No. 09-cv-01304-JVS-MLG

17 **CLASS ACTION**

18 **DECLARATION OF MICHAEL  
GOLDBERG IN SUPPORT OF  
MOTION OF THE STEC INC.  
INVESTOR GROUP FOR  
CONSOLIDATION OF  
RELATED ACTIONS,  
APPOINTMENT AS LEAD  
PLAINTIFF AND APPROVAL OF  
CO-LEAD COUNSEL**

19 Date: February 8, 2010  
Time: 1:30 p.m.  
Courtroom: 10C  
Honorable James V. Selna

20 [Captions Continue on Following Pages]

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27 No. 09-cv-01304-JVS-MLG

28 DECLARATION OF MICHAEL GOLDBERG IN SUPPORT OF MOTION OF THE STEC INC. INVESTOR GROUP  
FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF CO-LEAD COUNSEL

1 HADI SAKHAI, Individually and on  
2 Behalf of All Others Similarly Situated,

3 Plaintiff,

4 v.

5 STEC INC., MANOUCH MOSHAYEDI,  
6 MARK MOSHAYEDI, RAYMOND D.  
7 COOK, J.P. MORGAN SECURITIES  
8 INC., DEUTSCHE BANK SECURITIES  
9 INC., BARCLAYS CAPITAL INC. and  
10 OPPENHEIMER & CO. INC.,

11 Defendants.

12 FRED GREENWALD, Individually and  
13 on Behalf of All Others Similarly  
14 Situated,

15 Plaintiff,

16 v.

17 STEC INC., MANOUCH MOSHAYEDI  
18 and MARK (MERHDAD)  
19 MOSHAYEDI,

20 Defendants.

21 DANIEL MUNTER, Individually and on  
22 Behalf of All Others Similarly Situated,

23 Plaintiff,

24 v.

25 STEC INC., MANOUCH MOSHAYEDI,  
26 MARK MOSHAYEDI and RAYMOND  
27 D. COOK,

28 Defendants.

No. 09-cv-01306-JVS-MLG

No. 09-cv-01315-JVS-MLG

No. 09-cv-01320-JVS-MLG

[Captions Continue on Following Page]

1 MARCEL WEINBERGER, Individually  
 2 and on Behalf of All Others Similarly  
 3 Situated,

4 Plaintiff,

5 v.

6 STEC INC., MANOUCH MOSHAYEDI,  
 7 MARK MOSHAYEDI and RAYMOND  
 8 D. COOK,

9 Defendants.

10 JONATHAN FISCHER, Individually and  
 11 on Behalf of All Others Similarly  
 12 Situated,

13 Plaintiff,

14 v.

15 STEC INC., MANOUCH MOSHAYEDI,  
 16 MARK MOSHAYEDI and RAYMOND  
 17 D. COOK,

18 Defendants.

No. 09-cv-01460-JVS-MLG

No. 09-cv-08536-JVS-MLG

I, Michael Goldberg, hereby declare as follows:

1. I am a partner of Glancy Binkow & Goldberg LLP, counsel for movants  
 Jesus Tudela, Emilio Gerov, Mark Patel and Garrett Nishihara (collectively, the  
 “STEC Inc. Investor Group” or “Movants”). Movants seek, *inter alia*, to be  
 appointed as lead plaintiff pursuant to Section 21D of the Securities Exchange Act of  
 1934 in the above-captioned action (the “Action”). I submit this Declaration, together  
 with the attached exhibits, in support of the motion of the STEC Inc. Investor Group  
 to appoint Movants to serve as lead plaintiff on behalf of the class in the Action and  
 to approve Movants’ selection of Saxena White P.A. and Glancy Binkow & Goldberg  
 LLP as co-lead counsel. I am fully familiar with the facts set forth herein.

2. Attached hereto as the exhibits indicated are true and correct copies of  
 the following:

- 1                   Exhibit A: Press release published on November 6, 2009, on *Business*  
2                   *Wire*, announcing pendency of the lawsuit commenced by  
3                   Fred Jean, *et al.*, against defendants herein.  
4                   Exhibit B: Sworn shareholder certifications of Jesus Tudela, Emilio  
5                   Gerov, Mark Patel and Garrett Nishihara.  
6                   Exhibit C: Table reflecting the calculated losses incurred by Movnats  
7                   as a result of transactions in STEC, Inc. securities.  
8                   Exhibit D: Firm résumé of Saxena White P.A.  
9                   Exhibit E: Firm résumé of Glancy Binkow & Goldberg LLP.

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11                  I declare under penalty of perjury under the laws of the United States of  
12 America that the foregoing facts are true and correct. Executed this 5<sup>th</sup> day of January  
13 2010, at Los Angeles, California.

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15                  \_\_\_\_\_  
16                  /s/ *Michael Goldberg*  
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18                  Michael Goldberg  
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**PROOF OF SERVICE VIA ELECTRONIC POSTING PURSUANT TO**  
**CENTRAL DISTRICT OF CALIFORNIA LOCAL RULES AND ECF**  
**GENERAL ORDER NO. 08-02**

4 I, the undersigned, say:

5 I am a citizen of the United States and am employed in the office of a member  
6 of the Bar of this Court. I am over the age of 18 and not a party to the within action.  
7 My business address is 1801 Avenue of the Stars, Suite 311, Los Angeles, California  
90067.

8 On January 5, 2010, I caused to be served the following document:

9 10 11	<b>NOTICE OF MOTION AND MOTION OF THE STEC INC. INVESTOR GROUP FOR CONSOLIDATION OF RELATED ACTIONS, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF CO-LEAD COUNSEL</b>
12 13 14	<b>MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION OF THE STEC INC. INVESTOR GROUP FOR CONSOLIDATION OF RELATED ACTIONS, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF CO-LEAD COUNSEL</b>
15 16 17	<b>DECLARATION OF MICHAEL GOLDBERG IN SUPPORT OF MOTION OF THE STEC INC. INVESTOR GROUP FOR CONSOLIDATION OF RELATED ACTIONS, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF CO-LEAD COUNSEL</b>
18 19 20	<b>[PROPOSED] ORDER GRANTING MOTION OF THE STEC INC. INVESTOR GROUP FOR CONSOLIDATION OF RELATED ACTIONS, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF CO-LEAD COUNSEL</b>

21 By posting this document to the ECF Website of the United States District  
22 Court for the Central District of California, for receipt electronically by the following  
23 parties:

24 [SEE ATTACHED SERVICE LIST]

25 I certify under penalty of perjury under the laws of the United States of  
26 America that the foregoing is true and correct. Executed on January 5, 2010, at  
27 Los Angeles, California.

28  
s/Michael Goldberg  
Michael Goldberg

1           ***Jean v. STEC, Inc., et al., No. 09-cv-01304-JVS-MLG***2           **SERVICE LIST**3           **Electronically To All ECF-Registered Entities**

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4 **By US Mail To All Known Non-ECF-Registered Entities**

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